

**From:** [Cobb, Michael](#)  
**To:** [Epping WWTF](#)  
**Cc:** [Weitzler, Ellen](#); [Bukhari, Samir](#)  
**Subject:** Great Bay Total Nitrogen General Permit  
**Date:** Wednesday, March 10, 2021 4:04:00 PM

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Hi Jim,

Based on our discussion today and at your request, I would like to respond to your question regarding the ability of Epping to opt into the Great Bay Total Nitrogen General Permit now and then opt out (if desired) at the time of the next permit reissuance.

If the Town decides at the time of the next General Permit reissuance that it would prefer coverage of its nitrogen discharge to be included under its individual permit rather than under the reissued General Permit, the Town may choose to opt out of the reissued General Permit. In that scenario, the Town would remain covered by the administratively continued 2020 General Permit until EPA could either modify or reissue the Town's individual permit to include a nitrogen limit. Note that the nitrogen limit in an individual permit would not be based on the General Permit's adaptive management permitting strategy and would, therefore, likely be set at the limit of technology (currently 3.0 mg/L).

Please let me know if you have any questions or would like to discuss further.

Best,

Michael Cobb  
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